

P.C. 8400210

From: "Peter W. Gardner, MD" <pgardner@gastro.com>
To: <wvogl@samhsa.gov>
Date: 7/8/04 4:31PM
Subject: Revised Mandatory Guidelines FR DOCKET 04-7984

Sirs/Madams,

As by now you are no doubt aware, Paruresis is a condition whereby people are UNABLE not UNWILLING to urinate in the presence of others. Current policy does not permit for fair and appropriate testing given this condition. It is similar to reading an eye chart when one needs glasses. They simply can not rather than will not do it.

Paruresis is a condition I see in my practice very often. Treatment is supportive with various psychological methods and medications needed to even approach the condition. There is no cure, simply and most often, a modicum of improvement.

I therefore think it imperative that you mandate EITHER urine testing OR saliva, hair follicle, or sweat testing as alternative to urine testing for substances.

I look forward to your response to this note, and appreciate your consideration and hopefully your recognition of this problem. (By the way, statistically you have more than several people within HHS/SAMHSA with this condition.

Peter W. Gardner, MD, FACG, FACP